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12 **UNITED STATES DISTRICT COURT**

13 **DISTRICT OF NEVADA**

14
15 UNITED STATES OF AMERICA,
16 Plaintiff,
17 v.
18 MARK CUYUGAN,
19 Defendant.

20 Case No. 2:19-cr-00300-JCM-EJY

21 **STIPULATION TO MODIFY
22 CONDITIONS OF RELEASE
23 (First Request)**

24 IT IS HEREBY STIPULATED AND AGREED, by and between Christopher Chiou,
25 Acting United States Attorney, and Simon Kung, Assistant United States Attorney, counsel for
26 the United States of America, and Rene L. Valladares, Federal Public Defender, and Brandon
C. Jaroch, Assistant Federal Public Defender, counsel for Mark Cuyugan, that the Court modify
the condition of release to allow for the U.S. Pretrial Services Office to provide Mr. Cuyugan's
with his U.S. Passport.

The Stipulation is entered into for the following reasons:

1. On November 20, 2019, Ms. Cuyugan was released on a personal recognizance bond with certain conditions, including surrendering his passport to Pretrial Services. ECF No.'s 24 & 32.

1 2. Mr. Cuyugan is requesting that Pretrial Services furnish him his U.S. Passport
2 in order for him to make notarized copies as required by the U.S. Embassy to accommodate
3 travel for his daughter from the Philippines. *See Ex. A.*

4 3. Counsel for Mr. Cuyugan has spoken with Pretrial Services Officer Emily
5 McKillip who does not oppose this modification to allow Mr. Cuyugan to obtain his U.S.
6 Passport. Officer McKillip will also coordinate with Mr. Cuyugan for the release and return of
7 his U.S. Passport as needed.

8 4. The government has no objection to this requested modification.

9 This is the first stipulation to modify conditions of release filed herein.

10 DATED this 23rd day of March, 2021.

11 RENE L. VALLADARES
12 Federal Public Defender

13 _____
14 /s/ *Brandon C. Jaroch*
15 By _____
16 BRANDON C. JAROCH
17 Assistant Federal Public Defender

18 CHRISTOPHER CHIOU
19 Acting United States Attorney

20 _____
21 /s/ *Simon Kung*
22 By _____
23 SIMON KUNG
24 Assistant United States Attorney

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,
Plaintiff,
v.
MARK CUYUGAN,
Defendant.

Case No. 2:19-cr-00300-JCM-EJY

ORDER

MARK CUYUGAN,
Defendant.

Based on the pending Stipulation of counsel, and good cause appearing,

IT IS THEREFORE ORDERED that Pretrial Service has the authority to release Mr. Cuyugan's U.S. Passport to him and to establish the date and time of its release and return.

DATED this 23rd day of March, 2021.

21. Rayna J. Zouchal
UNITED STATES MAGISTRATE JUDGE